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August 23, 2013

Application Granted / ~~Denied~~
So Ordered.

A handwritten signature in black ink that reads 'Cathy Seibel'.

Cathy Seibel, U.S.D.J.

Dated: 8/26/13

BY FACSIMILE

Honorable Cathy Seibel
United States District Judge
Southern District of New York
Hon. Charles L. Brieant Jr. Federal
Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: *In re Mirena IUD Products Liability Litigation*
No. 13-MD-2434 (CS) (LMS)
This Document Relates to All Actions

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/26/13

Dear Judge Seibel:

At last week's status conference, the Court endorsed Bayer's request for an August 23, 2013 deadline for the parties' completion of negotiations respecting a proposed document production protocol and a proposed document preservation order. The Court directed that, in the event they were unable to resolve any differences, the parties should submit the proposed protocol and proposed order and present any points of disagreement for resolution by the Court or Magistrate Judge Smith.

We write to advise the Court that the parties have not, as of this date, reached complete agreement respecting the proposed protocol and order, but they have been continuing to negotiate and are making good progress in their efforts to achieve full agreement so as to hopefully avoid altogether the need for judicial intervention or, alternatively, to minimize the extent to which the Court's or Judge Smith's involvement will be necessary.

Given that the Court informed the parties that both it and Judge Smith will not be available the week of August 26-30, the parties would like to continue their negotiations so as to try and resolve their differences during the Court's absence next week. Accordingly, the parties respectfully request that Court extend the deadline for the parties' completion of discussions and

Honorable Cathy Seibel

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In re Mirena IUD Product Liability Litigation

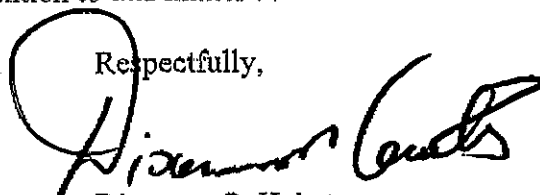
No. 13-MD-2434 (CS) (LMS)

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submission of a proposed document production protocol and proposed document preservation order by one week, to next Friday, August 30, 2013.

We thank the Court for its attention to this matter and consideration of this request.

Respectfully,



Diogenes P. Kekatos
Plaintiffs' Liaison Counsel

cc: By email

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FAX COVER SHEET

Date: August 23, 2013**Pages (including this coversheet):** 3**To:** Honorable Cathy Seibel**Fax:** 1-914-390-4278**Phone:** 1-914-390-4271**From:** Diogenes P. Kekatos**Email:** dkekatos@seegerweiss.com

Comments: Letter to the Court.

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